

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DELUX PUBLIC CHARTER, LLC d/b/a JSX AIR and JETSUITEX, INC.; XOJET, INC. d/b/a XO GLOBAL, LLC; and, BLADE URBAN AIR MOBILITY, INC.

Plaintiffs,

v.

COUNTY OF WESTCHESTER, NEW YORK, a charter county; APRIL GASPARRI, AIRPORT MANAGER; and, AVPORTS, LLC

Defendants.

CASE NO. 7:22-cv-01930-PMH

**PLAINTIFFS' RESPONSE TO COURT
REGARDING STIPULATION AND
PRELIMINARY INJUNCTION**

Pursuant to the Court's March 14, 2022 Memorandum Endorsement (ECF No. 37), Plaintiffs Delux Public Charter, LLC d/b/a JSX Air ("JSX"); JETSUITEX, INC.; XOJET, INC. d/b/a XO GLOBAL, LLC ("XOJet"); and, BLADE URBAN AIR MOBILITY, INC. ("Blade") ("Plaintiffs") hereby inform the Court that they believe a preliminary injunction is still necessary and therefore cannot withdraw their application for a preliminary injunction (ECF Nos. 14-19). Plaintiffs met and conferred with the County and were unable to reach an agreement that Plaintiffs believed obviated the need for a Preliminary Injunction.

Accordingly, Plaintiffs and the County will comply with the Court's briefing schedule for the preliminary injunction (to include abstention issues) as set forth in the Court's March 11, 2022 Minute Order (ECF No. 34).

Dated: March 16, 2022

TROUTMAN PEPPER HAMILTON
SANDERS LLP

By: /s/ John N. Thomas

John N. Thomas
Troutman Pepper Hamilton Sanders LLP
875 Third Avenue
New York, NY 10022
(212) 704-6000
Jack.thomas@troutman.com

Steven D. Allison, Esq. (Pro Hac Vice)
Troutman Pepper Hamilton Sanders LLP
5 Park Plaza, 14th Floor
Irvine, CA 92614
Steven.allison@troutman.com
(949) 622-2703

Counsel for Plaintiffs